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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

LEE LACY, an individual

Plaintiff,

v.

ELIZABETH PALMER, RANDALL  
RIBADA, R. PATRON, #7552, C.  
SNODGRASS, #0079, M. ALVARADO,  
#1067, D. MORSE, #9864, GREG  
BARNETT, WILLIAM DONOHUE,  
WILLIAM GORE, COUNTY OF SAN  
DIEGO, and DOES 1-20 inclusive,

Defendants.

Case No. '12CV0624 MMAJMA

**COMPLAINT FOR:**

- (1) VIOLATION OF 42 U.S.C. 1983  
EXCESSIVE FORCE (4th Amendment)
- (2) FAILURE TO TRAIN
- (3) FAILURE TO SUPERVISE AND  
DISCIPLINE
- (4) FAILURE TO INVESTIGATE
- (5) *MONELL* LIABILITY FAILURE TO  
PROPERLY SUPERVISE,  
INVESTIGATE AND DISCIPLINE

JURY TRIAL IS HEREBY DEMANDED

COMES NOW, Plaintiff, by and through his attorneys of record, and alleges and complains as follows:

**I.**  
**GENERAL ALLEGATIONS**

1. Jurisdiction is founded upon the existence of a federal question, pursuant to 28 U.S.C. §§ 1331, 1343(a)(3) and (4).

2. This is an action to redress the deprivation under color of statute, ordinance, regulation, custom or usage of rights, privileges, and immunities secured to the plaintiff by the Fourth and Fourteenth Amendments to the Constitution of the United States (42 U.S.C. § 1983) and arising under the law and statutes of the State of California.

3. Pursuant to 28 U.S.C. § 1391(b), venue is proper in the Southern District of California because the acts or omissions which form the basis of the Plaintiff's claims occurred in Chula Vista, California.

4. At all times relevant to this complaint, Plaintiff was an individual residing in San Diego County, California.

5. At some times relevant to this complaint, Defendants ELIZABETH PALMER, RANDALL RIBADA, R. PATRON, C. SNODGRASS, M. ALVARADO, D. MORSE were deputy sheriffs and agents of the COUNTY OF SAN DIEGO.

6. At some times relevant to this complaint, Defendant GREG BARNET was a lieutenant with the San Diego Sheriff's Department, and was the supervisor of Defendants PALMER, RANDALL RIBADA, R. PATRON, C. SNODGRASS, M. ALVARADO, D. MORSE. These defendants were agents of the COUNTY OF SAN DIEGO.

7. At some times relevant to this complaint, Defendant WILLIAM DONAHUE was a lieutenant with the Internal Affairs Unit and an agent of the COUNTY OF SAN DIEGO.

8. At some times relevant to this complaint, Defendant WILLIAM GORE was the sheriff of San Diego and a policy-maker.

9. At some times relevant to this complaint, Defendants DOES 1-20, were San

1 Diego sheriffs and agents of the COUNTY OF SAN DIEGO. At some times relevant hereto,  
2 these defendants were acting in their professional capacity as San Diego sheriffs and at other  
3 times they were working in their personal capacity as individuals outside the scope of their  
4 employment.

5 10. Plaintiff is truly ignorant of the true names and capacities of DOES 1 through 20,  
6 inclusive, and/or are truly ignorant of the facts giving rise to their liability and will amend this  
7 complaint once their identities have been ascertained as well as the facts giving rise to their  
8 liability.

9 11. These Defendants were agents, servants and employees of each other of the other  
10 named defendants and were acting at all times within the full course and scope of their agency  
11 and employment, with the full knowledge and consent, either expressed or implied, of their  
12 principal and/or employer and each of the other named defendants and each of the defendants had  
13 approved or ratified the actions of the other defendants thereby making the currently named  
14 defendants herein liable for the acts and/or omissions of their agents, servants and/or employees.

15 **II.**  
16 **FACTS**

17 12. Plaintiff realleges all prior paragraphs of this complaint and incorporates the same  
18 herein.

19 13. On November 14, 2010, Lee Lacy went to the Chula Vista courthouse to have a  
20 "fix-it" ticket signed off. The ticket was for tail lights and exhaust in his car, which he had  
21 repaired in compliance with the ticket.

22 14. Mr. Lacy went into the Sheriff's office in the courthouse to get a signature from a  
23 deputy on his ticket.

24 15. When Mr. Lacy was speaking with an employee at the front desk, Defendant  
25 Palmer approached Mr. Lacy and engaged him in a heated confrontation.

26 16. Defendant Palmer slapped her hand hard on the desk and told him that she would  
27 not sign off on Mr. Lacy's ticket.  
28

1           17. Defendant Palmer was visibly angry. Palmer's face became flushed and red. She  
2 was leaning over the counter at Mr. Lacy.

3           18. Palmer was yelling at Mr. Lacy and screamed at him to "get the hell out of this  
4 office."

5           19. Mr. Lacy turned away to leave.

6           20. As Mr. Lacy was walking away from Palmer and walked out of the door, she  
7 continued to scream at him to leave.

8           21. Unbeknownst to Mr. Lacy, Defendant Ribada followed Mr. Lacy out of the  
9 Sheriff's office as he walked away.

10           22. As he was walking away, Defendant Ribada put his hands on Mr. Lacy's lower  
11 left back and shoved him.

12           23. Taken by surprise, Mr. Lacy pulled away and said "Don't touch me."

13           24. Defendant Ribada told Mr. Lacy "Hey, come here."

14           25. Mr. Lacy told him that he was going home as Defendant Palmer had just been  
15 screaming at him to get the "hell out"

16           26. Defendant Ribada grabbed Mr. Lacy's arm without warning.

17           27. Defendant Ribada, Defendant Patron and Does 1-20 attacked Mr. Lacy and took  
18 him to the floor.

19           28. No Defendant told him that he was under arrest.

20           29. Defendant Palmer knelt down and screamed at Mr. Lacy as he was laying on the  
21 floor.

22           30. Defendant Palmer was foaming at the mouth as she was screaming at Mr. Lacy  
23 that she would to use the Taser on him.

24           31. Defendants slammed Mr. Lacy's face onto the floor. They punched Mr. Lacy.

25           32. Defendant Ribada leaped onto Mr. Lacy who was laying on his back on the floor,  
26 attempting to body slam Mr. Lacy.

27           33. Mr. Lacy put up his hands to protect himself.  
28

1           34. Defendant Palmer grabbed Mr. Lacy's right shoulder and wrist. Palmer pressed  
2 Mr. Lacy into the floor with her body weight on top of him.

3           35. Defendant deputies pulled, shoved, punched and kicked Mr. Lacy.

4           36. Defendant Snodgrass shoved Mr. Lacy's head into the floor. Snodgrass put his  
5 weight on the back of Mr. Lacy's head and shoved it into the ground.

6           37. Defendant Alvarado held down Mr. Lacy's legs. He punched Mr. Lacy's calf.

7           38. Defendant Patron placed her body weight on top of Mr. Lacy as he was laying on  
8 the floor, making it impossible for Mr. Lacy to comply with the other deputies' instructions to  
9 turn his body over.

10           39. Defendant Morse used pressure point on Mr. Lacy's right ear, causing him great  
11 pain, and pulled on Mr. Lacy's arm.

12           40. Lee Lacy did not resist arrest.

13           41. Mr. Lacy suffered injuries to his face, head and ribs. He was bleeding on himself  
14 from the laceration to his face.

15           42. Mr. Lacy was taken to Scripps hospital.

16           43. Mr. Lacy received stitches on his face. His eyes were swollen.

17           44. Mr. Lacy's arm and wrist were purple with bruising.

18           45. After Mr. Lacy was brought back from Scripps Hospital, one of the deputies told  
19 him "you're going down, homeboy."  
20

21           46. When Mr. Lacy was speaking to Defendant Ribada, defendant Palmer approached  
22 and told Mr. Lacy to "shut the fuck up."

23           47. Defendants charged Mr. Lacy with four criminal charges.

24           48. Defendant Ribada filed a report that was rife with inaccuracies and false  
25 statements to justify the use of force on Mr. Lacy.

26           49. Mr. Lacy filed a complaint with the Internal Affairs, requesting an investigation.

27           50. Defendant Donahue notified Mr. Lacy that an investigation had been conducted  
28 and it resulted in the "Disposition of Unfounded."

**III**  
**FIRST CAUSE OF ACTION**  
**(Civil Rights Action (42 U.S.C. § 1983))**  
**Excessive Force under the Fourth Amendment Against Defendants PALMER, RIBADA,**  
**PATRON, SNODGRAS, ALVARADO, MORSE and Does 1 to 20**

54. 42 U.S.C. § 1983 provides in part:

55. Plaintiff, Mr. Lacy, had a firmly established right under the Fourth Amendment to be free from unreasonable and excessive force being used against him to effect an arrest, search or seizure.

57. There was no need for any use of force because Mr. Lacy was walking away and minding his own business.

59. The use of the force in taking Mr. Lacy down was unreasonable and excessive.

61. The defendants were at this time performing their duties as officers for Defendant County of San Diego.

64. Defendants, separately and in concert, engaged in the illegal conduct to the injury of the plaintiff, and deprived plaintiff of the rights, privileges and immunities secured to Plaintiff by the Fourth Amendment to the Constitution and the laws of the United States.

**IV.**  
**SECOND CAUSE OF ACTION**  
**[Civil Rights Action (42 U.S.C. § 1983)**  
**For Failure to Properly Train Against Defendants**  
**SAN DIEGO, GORE and BARNETT]**

67. COUNTY OF SAN DIEGO, GORE and BARNETT, as a matter of custom, practice and policy, failed to maintain adequate and proper training for deputy sheriffs in the department necessary to educate the officers as to the Constitutional rights of citizens and arrestees; and to prevent the unreasonable and/or unnecessary use of force on citizens.

68. Defendants failed to provide adequate training to deputy officers that held the power, authority, insignia, equipment and arms entrusted to them. Defendants failed to promulgate and enforce adequate policies and procedures related to police misconduct, the violation of citizens' civil rights by deputy sheriffs, and harassment and assault.

69. Defendant Barnett was a lieutenant and the supervisor of the individual defendants. Barnett failed to properly train his subordinates with respect to the use of force.

70. Therefore, these Defendants, with deliberate indifference, disregarded a duty to protect the public from official misconduct.





82. As a result of Defendants actions, Plaintiff suffered damages in the amount to be proven at trial.

**VI.**  
**FOURTH CAUSE OF ACTION**  
**Civil Rights Action (42 U.S.C. § 1983) For Failure to Properly**  
**Investigate Citizen Complaints Against Defendants**  
**COUNTY OF SAN DIEGO, GORE, DONAHUE and BARNETT**

83. Plaintiff realleges all prior paragraphs of this complaint and incorporates the same herein.

84. COUNTY OF SAN DIEGO, GORE, DONAHUE and BARNETT, as a matter of custom, practice and policy, failed to properly investigate citizen complaints against deputies to prevent, deter and punish unnecessary and excessive use of force.

85. Defendants had knowledge of prior incidents of misconduct and civil rights violations by other deputies involving similar facts.

86. Defendants had knowledge of prior incidents of misconduct and civil rights violations by the same deputies.

87. Defendants covered up the misconduct of the deputies when citizens filed complaints against them.

88. Defendants failed to investigate the claims of wrongful conduct when citizens filed complaints against deputies.

89. Defendants were, or should have been, aware that the policy regarding the investigation of officers who violated the civil rights of the citizens was so inadequate that it was obvious that a failure to correct it would result in further incidents by its deputies.

90. The Constitutionally deficient investigation was done with deliberate indifference to the rights of Plaintiff and others in his position.

91. The lack of adequate investigation caused Plaintiff's damages.

92. As a result of Defendants actions, Plaintiff suffered damages in the amount to be proven at trial.

VII.

**FIFTH CAUSE OF ACTION**

**(Monell Municipal Liability Civil Rights Action (42 U.S.C. § 1983)**

**Against Defendant COUNTY OF SAN DIEGO)**

**Inadequate System of Supervising, Reviewing Citizen Complaints and Disciplining**

93. Plaintiff realleges all prior paragraphs of this complaint and incorporates the same herein by this reference as if those paragraphs were set forth in full herein.

94. San Diego deputy sheriffs, acting under color of law, have subjected Plaintiff and other persons similarly situated to a pattern of conduct consisting of assault, battery, intentional and negligent infliction of emotional distress, the use of excessive force, the imposition of punishment without due process of law, in denial of rights, privileges and immunities guaranteed Plaintiff and other residents of the state of California by the Constitution of the United States.

95. Defendant County of San Diego systematically failed to investigate claims of misconduct or to discipline wrongdoers after citizens made complaints related to its deputies.

96. The deficiencies in the complaint process encouraged additional misconduct or excessive force violations.

97. Defendant was aware of the complaints against the individual defendants.

98. Defendant failed to properly investigate citizen complaints.

99. This systematic inadequacies permitted serious misconduct of its deputies to go unchecked.

100. Continued official tolerance of repeated misconduct facilitated similar unlawful actions to occur.

101. The failure to institute an adequate system to receive, investigate, and resolve citizen complaints against deputies amounts to a policy of deliberate indifference to the need for police supervision.

102. San Diego County's complete failure to maintain an adequate system of disciplining officers who act unconstitutionally represents a policy for which the County is responsible.

1           103.    The County's policy caused or was a substantial factor in plaintiff's injuries.

2           104.    Defendant created a climate of lawlessness engendered by non-supervision.

3           105.    Due to this *de facto* policy, the defendant deputies committed assault and battery  
4 upon arrestees without any fear of consequences.

5           106.    Defendant County of San Diego knew or should have known of the risks posed by  
6 the Department's *de facto* policies.

7           107.    During the relevant period defendant police officers, Doe 1 through 20, were  
8 acting pursuant the unwritten but *de facto* policy of Defendant County of San Diego.

9           108.    The unlawful and illegal conduct of Defendant, its agents, servants and employees  
10 and each of them, deprived Plaintiff of the rights, privileges and immunities secured to him by  
11 the Constitutions of the United States and of the State of California.

12           109.    Defendant had a duty to Plaintiff to act with ordinary care and prudence so as not  
13 to cause harm or injury to another.

14           110.    By engaging in the acts alleged herein, Defendant failed to act with ordinary care  
15 and breached its duty of care owed to Plaintiff.

16           111.    As a direct, proximate and foreseeable result of Defendant's breach of its duty of  
17 care, Plaintiff suffered damages in an amount according to proof at the time of trial.

18  
19           WHEREFORE, Plaintiff prays as follows:

20           1.       For general and special damages according to proof at the time of trial;

21           2.       For punitive damages;

22           3.       For costs of suit and interest incurred herein;

23           4.       For an award of attorney's fees;

24           5.       For punitive damages; and

25           6.       Any further injunctive or declaratory relief this court deems just and proper,  
26 including an injunction requiring the institution proper training procedures, and appropriate  
27 supervision and discipline procedures.  
28

1 DATED: March 12, 2012

Respectfully submitted,

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4  
5 /s/ Julia Yoo  
6 Eugene G. Iredale  
7 Julia Yoo  
8 Attorneys for Plaintiff  
9 LEE LACY  
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JS 44 (Rev. 12/07)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

## I. (a) PLAINTIFFS

Lee Lacy

(b) County of Residence of First Listed Plaintiff San Diego  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Julia Yoo, Iredale and Yoo, APC (619) 233-1525  
105 West F St. 4th Floor, San Diego, CA 92101

## DEFENDANTS

ELIZABETH PALMER, et al.

County of Residence of First Listed Defendant San Diego  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

Attorneys (If Known) '12CV0624 MMAJMA

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☒ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motion to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

## V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from another district (specify)  
☐ 6 Multidistrict Litigation  
☐ 7 Appeal to District Judge from Magistrate Judgment

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
42 USC 1983

Brief description of cause:  
excessive force, failure to train, failure to supervise, failure to investigate, Monell

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23  
**DEMAND \$**  
1,000,000.00

CHECK YES only if demanded in complaint:

**JURY DEMAND:** ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

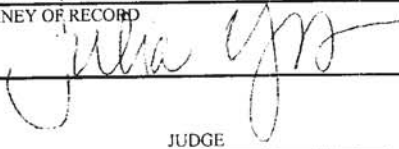
JUDGE

DOCKET NUMBER

DATE

03/12/2012

SIGNATURE OF ATTORNEY OF RECORD



FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_